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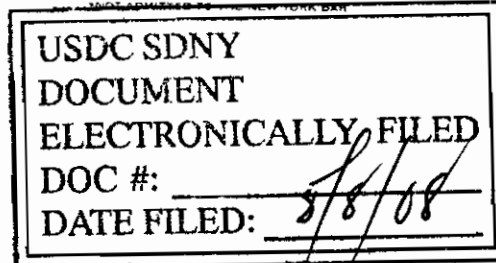
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**By Facsimile**

The Honorable Loretta A. Preska  
 United States District Court  
 Southern District of New York  
 Daniel Patrick Moynihan United States Courthouse  
 500 Pearl Street, Room 1320  
 New York, New York 10007



*Pureland Pictures, Inc. v. Mehret Mandefro*, No. 07 Civ. 10448 (LAP)

Dear Judge Preska:

We represent plaintiff Pureland Pictures, Inc. ("Pureland"), and are writing in response to the letter from defendant Dr. Mehret Mandefro that was faxed to the Court earlier today. For the reasons discussed below, we oppose Dr. Mandefro's request for mediation and a further extension of the briefing schedule.

On March 10, 2008, the parties filed a stipulation setting forth a briefing schedule on Pureland's motion for summary judgment. That stipulation was so ordered by this Court on March 12. That schedule provided that after Dr. Mandefro filed her Amended Answer and Counterclaims, Pureland would have two weeks to serve its motion for summary judgment, Dr. Mandefro would have two weeks to serve her opposition papers, and Pureland would have one week to serve its reply. Consistent with that schedule, Pureland served its motion for summary judgment on April 7. Eight days later, on April 15, counsel for Dr. Mandefro contacted us to discuss settling the case. We prepared a draft settlement agreement and sent it to counsel for Dr. Mandefro on April 17. The next day, counsel for Dr. Mandefro requested that we consent to a ten-day extension of the time for Dr. Mandefro to file her opposition papers. We agreed to do so with the hope that we would be able to resolve this dispute amicably. Now, after having


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The Honorable Loretta A. Preska

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more than three weeks to prepare her opposition brief, Dr. Mandefro seeks an additional four-and-a-half week extension. The reason offered for this extension is that it is necessary "to give the parties ample time to reach a mutually agreeable settlement." This purported rationale does not hold water.

The parties have been engaged in settlement negotiations for more than two weeks, numerous draft agreements have been exchanged, and the parties have had more than sufficient time to discuss the outstanding issues. At this point, nothing is left to be said, and we are frankly not sure that Dr. Mandefro ever had a good faith intention to settle this case. For those reasons, we do not think that mediation would be productive. We also do not think that a further extension of the briefing schedule is justified. Counsel for Dr. Mandefro have had ample time to prepare their opposition papers and should not be permitted to delay these proceedings any further. There simply is no reason why Dr. Mandefro should need eight weeks to respond to a motion that took us only two weeks to draft. Accordingly, we respectfully request that Your Honor deny the request for an additional enlargement of time.

Respectfully submitted,

  
Darren W. Johnson

cc: Michael Ridgway Jones (via facsimile)

*Defendant's time to file papers opposing  
Plaintiff's motion for summary judgment  
is extended to May 12.*

SO ORDERED

  
LORETTA A. PRESKA  
UNITED STATES DISTRICT JUDGE

*May 7, 2008*